

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

CLEVELAND BROWNS FOOTBALL COMPANY LLC,	)	CASE NO. 1:24-CV-01857
	)	
	)	
Plaintiff,	)	JUDGE DAVID A. RUIZ
	)	
vs.	)	
	)	Magistrate Judge
THE CITY OF CLEVELAND,	)	Jonathan D. Greenberg
	)	
Defendant,	)	
	)	Defendant's Motion to Dismiss
STATE OF OHIO,	)	
	)	
Intervenor.	)	<b>ORAL ARGUMENT REQUESTED</b>

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**DEFENDANT CITY OF CLEVELAND'S  
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

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Defendant City of Cleveland moves this Court under Fed. R. Civ. P. 12(b)(1) and 12(b)(6), as well as this Court's inherent authority, to dismiss the Amended Complaint (Doc. 12). A memorandum in support is filed concurrently and incorporated by reference. Counsel for the City also respectfully requests oral argument on this Motion, to the extent that the Court would find oral argument useful for resolving this Motion.

Respectfully submitted:

/s/ Justin E. Herdman

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was filed electronically on the 15th day of January, 2025. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/ Justin E. Herdman*

*One of the Attorneys for Defendant The City of  
Cleveland*